



September 4, 2001

Ms. Gwen Zervas
Case Manager
New Jersey Department of Environmental Protection (NJDEP)
Bureau of Federal Case Management
Division of Responsible Site Party Remediation
CN 028
Trenton, NJ 08625-0028

Subject: L.E. Carpenter & Company (LEC) – NJD002168748
NJDEP Letter of August 23, 2001 Regarding RMT's May 2001 *"Revised Work Plan for Delineating and Characterizing Elevated Lead Concentrations in Soil"*

Dear Ms. Zervas:

L.E. Carpenter received the subject letter on August 28, 2001. On behalf of L.E. Carpenter, RMT has prepared this letter to comply with your demand to respond within seven (7) calendar days from our receipt of the letter.

The attached Figures 1 and 2 show proposed tentative locations for ten background samples that we may collect as part of the lead-delineation work plan. However, it is important to note that actual sampling locations may change based on access issues and nature of surficial soils. More importantly, it is possible that test results from soils we collect directly on site will be adequate to define background conditions applicable to the LEC property. For example, initial field data may show that soils with lead concentrations above the 600-ppm cleanup level are restricted to specific on-site areas (for example, the former Building-14 area). In this case, the proposed on-site background samples and some lead-delineation soil samples would be sufficient to define site-specific soil-lead background conditions, and collection of off-site samples would not be necessary. For this reason, the sampling program should maintain a certain level of flexibility in terms of number and location of background soil samples. Flexibility is especially appropriate in this case, because of the real-time analytical results we will obtain through use of the portable XRF unit. Because of the XRF data, we will be able to ascertain in the field if soil lead values above 600 ppm are restricted to on-site locations. In this manner, sufficient soil samples can be obtained that will result in an adequate characterization of background soil-lead conditions. Such an adequate characterization will not include any off-site background sampling.

The justifications for the proposed sampling locations are as follows:

- **Samples 1-4 (Figure 1)** – These samples will represent on-site areas that have no apparent association with past on-site manufacturing operations. They are located along the outer fringes of the LEC property. Two of these samples may predominantly consist of old (pre-manufacturing) fill material (3 and 4), and the other two likely will consist predominantly of native soil materials (1 and 2).



Ms. Gwen Zervas
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Page 2

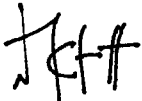
- **Samples 5 and 6 (Figure 1)** – These locations represent soils located in proximity to the former Orchard Mine. These samples may contain constituents related to past mining operations.
- **Samples 7 – 10 (Figure 2)** – These samples were located in areas that should be reflective of true regional background concentrations because they are not in the immediate vicinity of man-made structures or areas of known fill. Two of the samples are located in areas where alluvial sediments would be expected to predominate (8 & 9), and the other two are located in upland (colluvium) areas (7 & 10).

We will address potential risk to human health and ecology as part of a focused feasibility study in the event that data from completion of the lead delineation and characterization workplan warrants a change in the current ROD remedy.

In terms of the schedule, it is not possible to predict a specific project completion date given the unknown period needed for regulatory review of our submittals (in this case approximately 90 days). The schedule we provided in the May 2001 Workplan is reasonable given uncertainties in scheduling, actual number of samples that will be collected, and data acquisition from the laboratory. Nevertheless, RMT will make every effort to provide a final report on the lead-delineation workplan implementation by March 1, 2002 assuming EPA/DEP approves the attached tentative background locations within five (5) working days from receipt of this letter.

Sincerely,

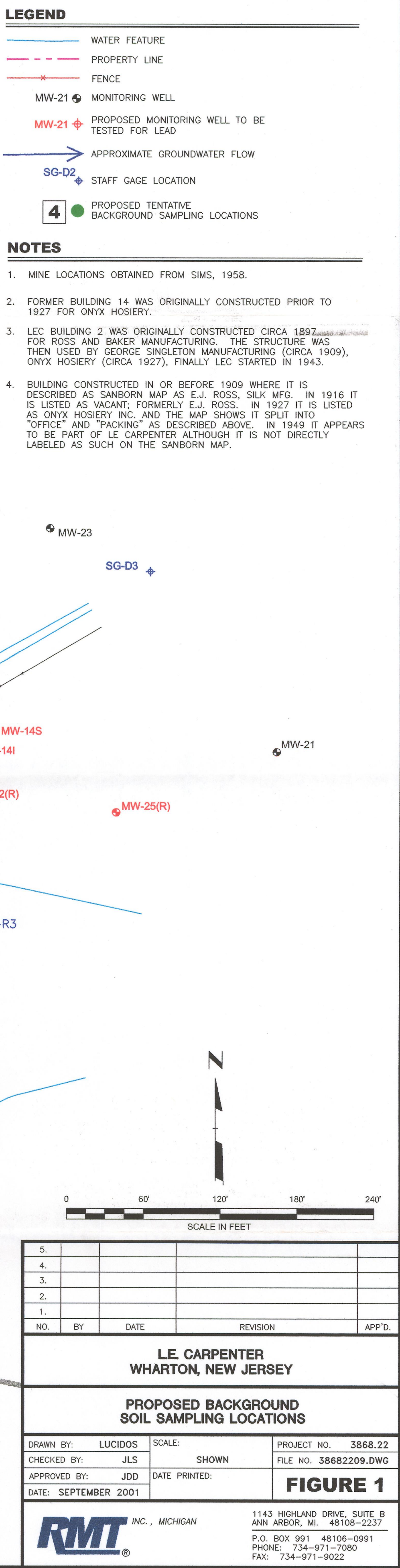
RMT, Inc.



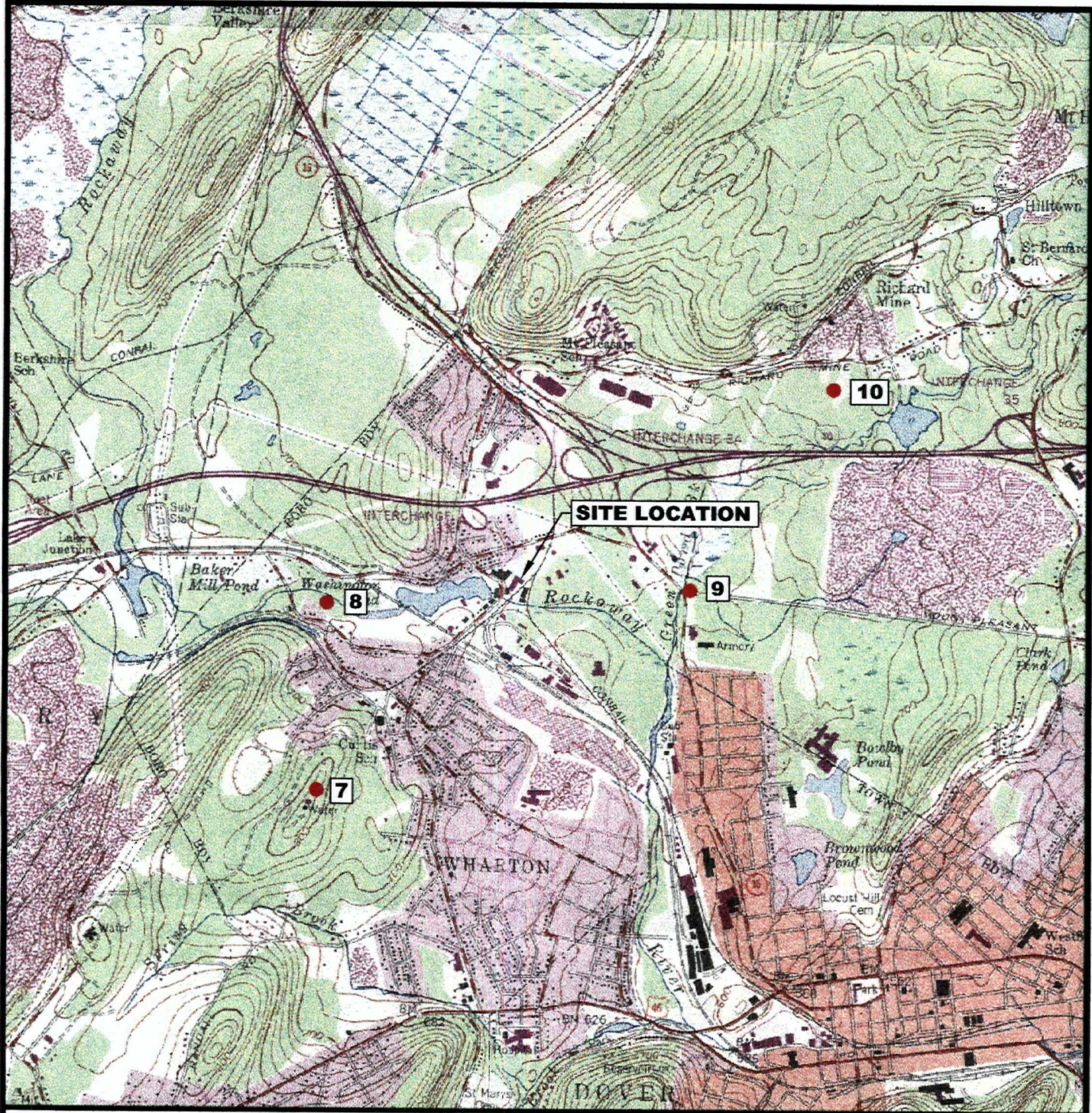
Nicholas J. Clevett
Project Manager

Attachment(s): Figure 1: Proposed Background Soil Sample Locations.
Figure 2: Proposed Off-Site Background Soil Sample Locations

cc: Cris Anderson (LEC)
Stephen Cipot (EPA)
Jim Dexter (RMT)
Drew Diefendorf (RMT)
Central Files (2)



Plot Time: 08:18:5574 AM
 Attached Xrefs:
 197915 Bytes
 Tuesday, September 4, 2001
 Dwg Size:
 Plot Date:
 Operator Name: lucidos
 C:\Program Files\ACAD2000\RMT Projects\LEC2338682310\530007



LEGEND

- 10** PROPOSED TENTATIVE OFF-SITE BACKGROUND SOIL SAMPLE LOCATIONS

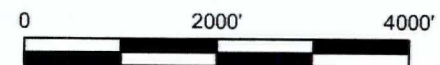
SOURCE

1. BASE MAP DEVELOPED FROM THE DOVER, NEW JERSEY 7.5 MINUTE U.S.G.S. TOPOGRAPHIC QUADRANGLE MAP, DATED 1954, PHOTOREVISED 1981.

NEW JERSEY



QUADRANGLE LOCATION



APPROXIMATE SCALE IN FEET



**LE CARPENTER
 WHARTON, NEW JERSEY**

**PROPOSED OFF-SITE BACKGROUND
 SOIL SAMPLE LOCATION MAP**

DRAWN BY:	SJL
APPROVED BY:	JDD
PROJECT NUMBER:	3868.23
FILE NUMBER:	38682310.DWG
DATE:	SEPTEMBER 2001

FIGURE 2

PLOT DATA
 Drawing Name:



Transmittal Letter

RMT, Inc. ("RMT")
222 South Riverside Plaza, Suite 820
Chicago, IL 60606
Tel. (312) 575-0200 • Fax (312) 575-0300

*Sent Via FedEx
Priority Overnight*

To: Stephen Cipot Project Manager USEPA Region II 290 Broadway Floor 19 New York, NY 10007-1866 (212) 637-4411	Date: 9/4/01 Project No.: 00-03868.19 Subject: LE. Carpenter - Wharton NJ
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Prepared By: Nicholas J. Clevett **Title** Senior Project Manager

Signature: 

We are sending you:

☒ Copy of Letter ☒ Lead Drawings

COPIES	DATE	NO.	DESCRIPTION
1	9/4/01	3868.19	Response to Agency Comments on Lead Workplan

These items are transmitted as checked below:

☒ As requested ☒ For review and comment

Remarks

Stephen:

Find enclosed the above mentioned item for your review and comment. I will be in touch.

Nick

cc: Gwen Zervas NJDEP
Cris Anderson LEC